Meeting Minutes

B Plant Project Managers Meeting
MO-414 Conference Room, 200 East Area
Richland, Washington

July 17, 1997
9:00 a.m. - 11:00 a.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above-dated meeting.

David T. Evans Date: 8/21/97
David T. Evans, Project Manager, DOE-RL

Ted A. Wooley Date: 8/21/97
Ted A. Wooley, Project Manager, Washington State Department of Ecology

Steve D. Godfrey Date: 8/22/97
Steve D. Godfrey, B Plant Contractor Representative, BWHC

George W. Reddick Date: 8/21/97
George W. Reddick, PHMC Representative, FDH

Agenda: The agenda for the July 17, 1997 meeting included the following B Plant Facility Transition topics:

1) Approve Minutes from Previous Project Managers Meetings
2) B Plant Waste Analysis Plan Update
3) Resolution of Ecology Comments on Miscellaneous Tanks Sampling and Analysis Plan
4) Open Discussion
5) Set Next Project Managers Meeting

B Plant Project Managers Meeting
MO-414 Conference Room
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July 17, 1997
9:00 a.m. - 11:00 a.m.

SUMMARY OF DISCUSSION AND COMMITMENTS/AGREEMENTS

Approve Minutes from Previous Project Managers Meetings

Mr. Ted Wooley, Washington State Department of Ecology (Ecology); Mr. Dave Evans, Department of Energy, Richland Operations Office (RL); Mr. George Reddick, Fluor Daniel Hanford, Inc. (FDH); and Mr. Steve Godfrey, B&W Hanford Company (BWHC) approved and signed the meeting minutes from the June 19, 1997 B Plant Project Managers Meetings. The minutes were sent out ahead of time for review and all corrections were incorporated prior to approval.

B Plant Waste Analysis Plan Update

Mr. Tom Beam (BWHC) provided a brief update (Attachment 1) on the current status of the revision (Revision 2) to the B Plant Waste Analysis Plan (WAP), WHC-SD-WM-TI-438. Due to a lack of available resources, the schedule for completion of this document revision is expected to stretch into FY 1998.

Mr. Wooley expressed his intentions to provide comments on the copy of Revision 1 which was provided to him at the June meeting. This would expedite Ecology's review of the document and allow Ecology to focus only on the actual changes made in the draft revision. The current schedule calls for the draft revision to be issued for review by October 1, 1997, with an accelerated review from RL and Ecology by October 15, 1997. Final approval and issuance is expected by November 21, 1997.

Resolution of Ecology Comments on Miscellaneous Tanks Sampling and Analysis Plan

Mr. Beam provided a brief status update (Attachment 2) on the resolution of Ecology comments on the Miscellaneous Tanks Sampling and Analysis Plan. A working session with Ecology was held on July 2, 1997 and resolution was reached on the majority of issues, including deviations from standard sampling protocol which B Plant must employ due to ALARA concerns and equipment configuration. Mr. Wooley requested a copy of the sampling procedure which will be used to obtain the liquid samples from these tanks (ACTION: PMM-BP-97-6). Mr. Wooley indicated his satisfaction with the list of analytes

which are identified in the version of the SAP previously approved last fall by Ecology. No changes to this list of analytes will be necessary.

The remaining unresolved issues are the appropriate level of QA/QC to be employed for the sample analysis and results, and the analysis deviations and test procedures employed at the 222S Laboratory for these samples. Mr. Rick Gonzalez (RL) is working to arrange a meeting with 222-S personnel to discuss the test procedures associated with the chosen list of analytes and therefore resolve the QA/QC questions. (ACTION: PMM-BP-97-7). The plan is to try for July 25, 1997 or thereabout for the meeting and to coordinate with the current ongoing Ecology assessment of lab procedures.

Mr. Fen Simmons (BWHC) indicated that B Plant is still waiting to receive Ecology's comments on the SAP for incorporation prior to final approval. Mr. Wooley indicated that he would get those sent over via electronic mail as soon as possible (ACTION: PMM-BP-97-8).

Open Discussion

Mr. Godfrey provided an update that a total of 264 End Points are now completed. Mr. Wooley indicated that Ecology comments on the End Point Document would be provided to RL and BWHC by the end of July (ACTION: PMM-BP-97-9).

Mr. Wooley questioned the absence of a Professional Engineer (PE) stamp on design drawings for the Low Level Waste Decoupling Project. Mr. Godfrey and Mr. Evans explained that a PE stamp, if required, is generally affixed upon completion of the review process conducted by technical staff. For the benefit of Mr. Wooley, an overview of the design review process will be included on the agenda for the next meeting (ACTION: PMM-BP-97-10).

Mr. Gonzalez indicated that he is still working to identify the appropriate individual from the Washington State Department of Health to invite them to the monthly project manager meetings.

Mr. Wooley was asked about the status of approval on the B Plant Part A Permit Application, Rev. 5. Mr. Wooley indicated that he had a couple outstanding questions and concerns yet to be resolved. Ecology will continue to work with RL and BWHC to resolve these concerns and issue an approval letter for the Part A Permit.

Mr. Gonzalez provided Mr. Wooley with a copy of a letter (Attachment 3) from J. E. Rasmussen, RL, to Michael Gearhead, EPA, and Mike Wilson, Ecology, "Management of Contaminated Equipment at the Hanford Site,".

OPEN OR RECENTLY CLOSED ACTION ITEMS

Action Item	Responsible Person	Description	Completion Date
PMM-BP-97-1	Tom Beam-BWHC	Provide Ecology with draft review copy of B Plant Waste Analysis Plan, Rev. 2 when complete.	OPEN
PMM-BP-97-2	Tom Beam-BWHC	Provide Ecology with copies of the shipping and waste certification documentation prepared for shipment of the organic waste to DSSI.	OPEN
PMM-BP-97-5	Rick Gonzalez-RL	Identify the appropriate WDOH contact and invite to the monthly project manager meetings.	CLOSED--7/29/97
PMM-BP-97-6	Tom Beam-BWHC	Provide Ecology with a copy of the sampling procedure to be used by B Plant to collect the liquid samples from the miscellaneous tanks.	CLOSED--8/6/97
PMM-BP-97-7	Rick Gonzalez-RL	Arrange meeting for Ecology with 222-S personnel to discuss analysis test procedures.	CANCEL--7/29/97
PMM-BP-97-8	Ted Wooley-Ecology	Provide Ecology comments on the Miscellaneous Tank SAP to RL and BWHC.	CLOSED--7/17/97
PMM-BP-97-9	Ted Wooley-Ecology	Provide Ecology comments on the B Plant End Point Document to RL and BWHC.	CLOSED--8/8/97
PMM-BP-97-10	Steve Godfrey-BWHC	Include agenda item for August meeting to provide overview of the design review process.	OPEN

Only open items and those which have been closed since approval of the last meeting minutes will be listed.

SCHEDULING OF NEXT MEETING

The next B Plant Project Managers Meeting is scheduled for August 21, 1997 to be held in the 200 East Area, MO-414 Conference Room from 9:00 am to 11:00 am.

JULY 17, 1997 ATTENDEE LIST

NAME	ORGANIZATION	PHONE NUMBER
Tom Beam	BWHC	372-0019
Dave Evans	RL-TPD	373-9278
Steve Godfrey	BWHC	372-0501
Rick Gonzalez	RL-TPD	373-9922
Pam Laughery	BWHC	372-0102
George Reddick	FDH	376-2326
Fen Simmons	BWHC	372-0413
Mike Stephenson	FDH	376-3870
Ted Wooley	Ecology	736-3012

Attachment 1

B Plant Project Manager Meeting Minutes--July 17, 1997

Handout--B Plant Waste Analysis Plan Revision

B PLANT WASTE ANALYSIS PLAN REVISION

- NO PROGRESS THIS MONTH

  >> Limited Resources (staff and $$)

- REVIEW DRAFT ANTICIPATED BY 10/1/97

  >> Copy Provided to Ecology

- ISSUE COMPLETED REVISION BY 11/21/97

- WILL INCORPORATE MISC. TANKS EFFORT TO EXTENT POSSIBLE

Attachment 2

B Plant Project Manager Meeting Minutes--July 17, 1997

Handout--Miscellaneous Tanks Sampling and Analysis Plan

MISCELLANEOUS TANKS SAMPLING AND ANALYSIS PLAN

- WORKING SESSION WITH ECOLOGY ON JULY 2, 1997

- REMAINING ISSUES ARE PRIMARILY QA/QC AT THE LABORATORY

  >> Sampling deviations at B Plant not considered to be significant
  >> Analyte list may need minor "tweaking"

- RL ARRANGING MEETING WITH 222S TO DISCUSS LABORATORY QA/QC

- B PLANT WAITING FOR ECOLOGY COMMENTS ON SAP

- B PLANT SCHEDULED TO BEGIN SAMPLING EVENTS IN 2-3 WEEKS

Attachment 3

B Plant Project Manager Meeting Minutes--July 17, 1997

Letter, J. E. Rasmussen, RL, to Michael Gearhead, EPA, and Mike Wilson, Ecology, "Management of Contaminated Equipment at the Hanford Site," dated June 9, 1995.

Gonzales

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

JUN 09 1995

95-PCA-337

Mr. Michael Gearheard, Chief
Waste Management Branch
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Mike Wilson, Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Gearheard and Wilson:

MANAGEMENT OF CONTAMINATED EQUIPMENT AT THE HANFORD SITE

Staff from your agencies have been meeting for the past several months, with representatives of the U.S. Department of Energy, Richland Operations Office (RL) and its contractors. The purpose of these meetings was to resolve contaminated equipment issues and develop a practical management policy on contaminated equipment which our agencies have been struggling with since early 1990.

The approach our staffs used to develop this strategy reflects our renewed philosophies to deal with difficult and sometimes controversial issues. Your agencies provided a list of concerns regarding a proposed Hanford Site policy for management of contaminated equipment in an August 31, 1994, letter to RL, entitled "Proposed Site Policy for Contaminated Equipment." In this letter, your agencies also indicated a desire to meet in order to discuss and resolve contaminated equipment issues and concerns to develop practical management standards and implementation strategies for the Hanford Site. Core teams of staff from each of the agencies were identified in March 1995, and since have met on a regular basis.

The result of this joint effort is the enclosed Management Strategy for contaminated equipment at the Hanford Site developed in concert with the regulatory agencies. It was further agreed, that rather than provide a formal approval of the enclosed policy, the regulators will monitor the implementation of the policy. State of Washington Department of Ecology (Ecology), U.S. Environmental Protection Agency (EPA), RL and its contractors will periodically evaluate the implementation of the policy, and by joint concurrence make changes that will make implementation more effective.

Ecology and EPA have agreed to provide formal notification for this process. RL intends to implement the management policy immediately. The new policy will supercede all previous policy to include that outlined and proposed in your letter to RL of August 31, 1994, cited previously.

Should you have any questions on this matter, please contact Mr. F. R. Miera of my staff on 373-7589.

Sincerely,

K. Mark Duncan for

James E. Rasmussen, Director
Environmental Assurance, Permits
and Policy Division

EAP:FRM

Enclosure

cc w/encl:
J. J. Badden, BHI
J. R. Wilkenson, CTUIR
D. Powaukee, NPT
T. J. Lazarski, PNL
L. M. Dittmer, WHC
E. M. Greager, WHC
R. Jim, YIN

MANAGEMENT OF CONTAMINATED EQUIPMENT AT THE HANFORD SITE

Purpose

The purpose of this policy is to define a consistent approach at the Hanford Site for managing equipment that has come into contact with dangerous waste in a manner that is protective of human health and the environment.

Background

The issue of contaminated equipment at the Hanford Site was initially raised in April 1990, by the U.S. Department of Energy, Richland Operations Office (RL). The issue was raised to address the management of equipment that had come into contact with tank waste, as listed waste codes had recently been added to this waste stream. Subsequent dialogue between RL, the State of Washington Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA) was expanded to include all equipment that contacts a dangerous waste, and culminated in a joint letter from Ecology and EPA to RL, "Proposed Site Policy for Contaminated Equipment," dated August 31, 1994. As used in the August 31 correspondence, "dangerous waste" refers both to waste regulated as hazardous under the Resource Conservation and Recovery Act (RCRA) and waste regulated as dangerous under the Washington State Dangerous Waste Regulations.

In response to this letter, the proposed RL policy for managing contaminated equipment at the Hanford Site was presented to Ecology and EPA on March 7, 1995. This presentation was attended by staff from EPA, Ecology, RL, Westinghouse Hanford Company, Pacific Northwest Laboratory, and the Environmental Restoration Contractor Team.

Categories of Contaminated Equipment

Contaminated equipment can be categorized as (1) waste, (2) installed and/or inaccessible, and (3) reusable. Waste equipment is equipment that is intended for discard or has been abandoned. Some equipment currently identified in this category will require further characterization to determine if it has contacted dangerous listed waste, if the matrix exhibits a characteristic, or if it can be handled as non-dangerous waste. Installed and/or inaccessible equipment is an integral part of a TSD, RPP, or CPP unit, inaccessible by plan or design, or isolated from the public and the environment. Reusable equipment has a clear purpose or function, and is not intended for discard. In support of waste minimization, RL intends to reuse contaminated equipment whenever possible.

Proposed Management Policy

- Equipment decontamination will be protective of human health and the

environment.

- Waste equipment that has contacted dangerous waste will be managed in compliance with Washington Administrative Code (WAC) 173-303.
- Installed and/or inaccessible contaminated equipment will be left in place and addressed during facility or operable unit closure.
- Reusable equipment will be managed to prevent releases of dangerous waste to the environment. Decontamination, when necessary, will be performed in a timely manner.

Presented below is a detailed discussion of the proposed management policy.

RL Policy: Equipment decontamination will be protective of human health and the environment.

Discussion:

Waste Equipment Decontamination:

The Debris Rule specifies three general categories of treatment technologies for hazardous debris, including: (1) extraction, (2) destruction, and (3) immobilization. The extraction and destruction technologies allow debris contaminated with listed constituents to exit RCRA Subtitle C requirements by meeting the performance standards for the specified technology. RL will implement this policy by determining the intent of each specific activity pertaining to equipment. When the intent of a decontamination activity is to treat a piece of waste equipment and meet the performance standard, such decontamination must be accomplished under a RCRA treatment permit within a RCRA-permitted facility, or in accordance with treatment by generator (TBG) provisions, or other regulatory authorizations such as CERCLA. Conversely, decontamination of waste equipment for radiation reduction or to meet As Low As Reasonably Achievable (ALARA) goals, without the intent of exiting RCRA regulation, may be conducted outside a RCRA-permitted facility. Examples of decontamination for ALARA purposes include chemical extraction, ice blasting, and steam cleaning, among other techniques. All wastes removed from the equipment are designated and managed according to WAC 173-303.

Waste equipment placed in interim storage as mixed waste will not necessarily be decontaminated to meet the Debris Rule performance standards. However, at the point of final land disposal, Debris Rule performance standards (or the applicable treatment standards for that waste) will be met. Treatment must take place in a permitted facility, treatment permits must be obtained and/or TBG conditions must be met when the intent of removing waste from equipment is to meet a Debris Rule extraction or destruction performance standard for waste equipment. All dangerous waste separated from equipment, including reusable equipment, will be designated and managed according to WAC 173-303.

Reusable Equipment Decontamination:

Imposition of Debris Rule performance standards to the decontamination of

reusable equipment is inappropriate in many cases, considering the Debris Rule was written to allow land disposal of contaminated debris (waste). The Debris Rule does not apply to reusable equipment. Simple decontamination techniques are far more appropriate for certain reusable equipment than treatment technologies of the Debris Rule. An example of overly burdensome requirements imposed on reusable equipment is the "clean debris surface" standard, if the Debris Rule is applied to its decontamination. There is no detriment to reusable equipment having varying degrees of staining (i.e., more than 5%). Compliance with the "clean debris surface" standard is also problematic in that both internal and external surfaces that contacted waste must be visually verified as clean. Certain types of equipment could not be inspected to this extent without dismantlement. Appropriate and timely decontamination is integral to preventing environmental releases of dangerous waste constituents.

Management practices for decontaminating reusable equipment must consider minimizing the amount of waste generated during decontamination while still protecting the environment. For example, some forms of contaminants may need to be rinsed off a piece of equipment, while other forms merely need to be wiped off. If free liquids are suspected, the equipment will be drained to remove as much waste as is technically feasible. If removal is not possible, engineered barriers will be used as necessary to prevent release of the waste to the environment. When free liquids are not a concern, engineered devices to prevent releases to the environment may not be required. Non-liquid contamination usually consists of either slight residue on the equipment (e.g., wrenches, tools, and sampling devices), or salt cake (e.g., tank farms equipment). Although the presence of salt cake on tank farm equipment may necessitate engineered devices, the majority of the reusable equipment can either be rinsed off or wiped off to achieve the goal of this policy. Cleaning reusable equipment will prevent releases to the environment but will not require compliance with the Debris Rule performance standards to achieve this end. Such decontamination of reusable equipment is not considered RCRA treatment.

RL Policy: Waste equipment that has contacted dangerous waste will be managed in compliance with WAC 173-303.

Discussion:

Contaminated equipment that is intended for discard or has been abandoned must be designated and managed in accordance with WAC 173-303, Washington State Dangerous Waste Regulations. Management options for storage of waste equipment include storage at a permitted or interim status unit, or accumulating the waste onsite in accordance with WAC 173-303-200 as appropriate. It may not be possible to meet all RCRA requirements for newly generated waste equipment designated as dangerous waste (e.g., highly radioactive mixed waste). To meet the goal of this policy, attempts will be made to minimize the generation of such waste equipment. RL will discuss the proper management of categories of RCRA non-compliant waste equipment with Ecology on a case-by-case basis.

RL Policy: Installed and/or inaccessible contaminated equipment will be left in place and addressed during facility or operable unit closure.

Discussion:

Installed equipment is not considered a waste until facility decommissioning and closure. Inaccessible equipment is isolated from the environment, such as equipment stored in cells in a canyon facility, or buried waste transfer piping. A management strategy for this type of equipment has been negotiated through the Hanford Federal Facility Agreement and Consent Order for several facilities, including the Plutonium-Uranium Extraction Facility and the Fast Flux Test Facility. Final disposition of this equipment for remaining facilities and operable units will be established during facility decommissioning/closure negotiations with EPA and Ecology.

Management of installed or inaccessible equipment will be protective of human health and the environment. This equipment is isolated from the environment and will be left in place until facility closure. The configuration and condition of the equipment will be maintained such that it does not pose a risk to workers or the environment. In some cases, the isolated equipment is located in a facility that is routinely monitored or surveilled, providing additional assurance that waste will not reach the environment. This approach provides for risk-based decisions to allow appropriate management of equipment. The equipment, and any waste within the equipment, is isolated from the environment.

RL Policy: Reusable equipment will be managed to prevent releases of dangerous waste to the environment. Decontamination, when necessary, will be performed in a timely manner.

Discussion:

Reusable equipment must have a clear purpose or function, and must be managed to prevent the release of dangerous waste to the environment. A determination of reusability shall be made for individual pieces of equipment and such justification shall be available at any given time. To ensure the assessment that a piece of equipment is reusable remains valid, this determination should be re-evaluated periodically. The criteria for determining if equipment is reusable includes one or more of the following:

- waste minimization,
- frequency of use,
- cost/benefit analysis,
- alternate uses and applications, and
- beneficial use within a reasonable time frame.

The storage of reusable equipment will be environmentally protective. Storage will include a barrier to the environment, as necessary, to prevent any releases of dangerous waste. For example, conex boxes have been placed at tank farms for storage of reusable equipment to provide additional

environmental protection. Large pieces of equipment will be stored in process-related areas. Many of the areas designated specifically for reusable equipment storage will be labeled to ensure clear segregation of reusable contaminated equipment.

Equipment that will be reused in the same process area will not require decontamination between uses as long as the policy goal is met. Large pieces of heavy machinery will require a visual inspection and timely decontamination prior to storage. Rolling stock will be surface decontaminated prior to transport away from the process-related area to prevent the spread of contamination. For example, trucks and front-end loaders that are working in dangerous waste landfill cells will not require decontamination unless removed from the process-related area.

Benefits of Policy:

This policy is protective of human health and the environment, requiring that all equipment be managed in a manner that minimizes the potential for a release of hazardous waste to the environment. Alternative decontamination methods for reusable equipment, when needed, minimize the generation of additional dangerous waste while ensuring safe storage of the equipment between uses. Improved identification and storage of reusable equipment provides a clear distinction between reusable and waste equipment, as well as accountability for making the decision and managing the equipment in a timely manner. Responsible management of equipment, as outlined in this policy, is a cost effective use of resources while protecting the environment and meeting the intent of the policy proposed by the EPA and Ecology.

Implementation:

Separate compliance negotiations with EPA and Ecology for certain waste equipment may be required. The waste equipment at Hanford that may require separate negotiations is located at the Tank Waste Remediation System (TWRS) Plant, and potentially some equipment managed by ICF Kaiser Hanford Company (ICF KH). Waste equipment at TWRS has already been the subject of separate discussions with the regulating agencies. Future discussions regarding potential waste contaminated equipment at ICF KH will be conducted with the agencies as appropriate. These discussions will continue until an agreement on compliance schedules is reached between the EPA, Ecology, and RL.

Prior regulator approval of specific decontamination procedures will not be required, as this policy will be considered self-implementing. Guidelines, including criteria for distinguishing waste and reusable equipment and managing reusable equipment in an environmentally protective and timely manner, will be provided to contractor staff based upon this equipment policy. The guidelines will be incorporated into the company policy of each Hanford contractor.

Westinghouse Hanford Company | **Internal Memo**

From: RCRA Field Services 018BO-95-137
Phone: 376-3132 H6-20
Date: September 28, 1995
Subject: IMPLEMENTATION OF THE CONTAMINATED EQUIPMENT MANAGEMENT POLICY

To: Distribution

cc: L. M. Dittmer H6-20
A. G. Miskho H6-20
M. J. Stephenson H6-20
L. T. St. Georges H6-20
EMG/LB

Reference: Letter, J. E. Rasmussen, RL, to M. Gearheard, EPA and M. Wilson, Ecology, "Management of Contaminated Equipment at the Hanford Site," 95-PCA-337, dated June 9, 1995.

The referenced letter provided formal submittal of the RL, policy for contaminated equipment management at the Hanford Site to the EPA and Ecology. This policy was developed through a joint effort of the prime contractors (WHC/ICF-KH, BHI, PNL, and the ERC Team) and RL staff. The policy was initially presented to the regulators for review and comment in March 1995. Through subsequent meetings, the regulator's comments were resolved and changes were incorporated into the final version of the policy that was formally submitted to the agencies in June 1995.

It was agreed that rather than provide a formal approval of the policy, the regulators will monitor the implementation of the policy. It is expected that this will be accomplished as they conduct inspections at the Hanford Site. These inspections will provide the basis for determining the effectiveness of the policy. Ecology and EPA, along with RL and its contractors, will periodically evaluate the implementation of the policy, and incorporate changes that will make the policy more effective. RL intends to pursue formal acceptance of the policy by the regulators during FY 1996. However, this policy is intended to be a living document that may be concurrently revised with the regulators to adapt to changing circumstances.

The policy is self-explanatory; therefore, this memo is intended to provide insight on some of the areas that were of concern to the regulators and to aid in consistent implementation of the policy across organizations. Three categories of contaminated equipment were identified at the Hanford Site for the purpose of this policy: waste, installed/inaccessible, and reusable. During the policy negotiations, several concerns were identified by the regulators. These are included in the following discussion points from the equipment policy:

- Decontamination Activities
- Management of Waste Equipment
- Installed/Inaccessible Equipment
- Definition & Storage of Reusable Equipment

Decontamination Activities

- Waste equipment - Decontamination of waste equipment, when intended to allow the equipment to meet a Debris Rule performance standard and exit RCRA Subtitle C, must be accomplished (1) under a RCRA treatment permit within a RCRA-permitted facility, (2) in accordance with treatment by generator provisions, or (3) under other regulatory authorizations such as CERCLA. Waste equipment that will be placed in RCRA-permitted interim storage as mixed waste does not need to meet the Debris Rule Performance Standards until final land disposal. If the intent of equipment decontamination is for radiation reduction or to meet ALARA goals (without intending to exit RCRA), the decontamination may take place outside a RCRA-permitted facility.

- Reusable equipment - Reusable equipment decontamination is not subject to Debris Rule Performance Standards. This activity can take place outside of a RCRA-permitted facility. The option of doing no decontamination of reusable equipment is acceptable, as long as there are no releases of dangerous waste to the environment as a consequence.

The regulators emphasized the concern that all wastes removed from contaminated equipment during decontamination activities must be designated and managed according to The Washington Administrative Code (WAC) "WAC 173 303." This applies to decontamination of reusable as well as waste equipment. A recent example included the discovery of listed waste constituents contained in the soil at an excavation site. Contaminated soil in the equipment was dumped out of the backhoe into the excavation site (not a waste), then the backhoe was inspected for soil remaining on the equipment. Other equipment used at the site, such as shovels and shoring, were cleaned by knocking the soil off the equipment back into the site, then inspected for any remaining soil. Due to the nature of the media (typical dry, sandy Hanford Soil), no further decontamination of this reusable equipment was required. Had any further measures been required to decontaminate the equipment prior to its reuse at another job site, any waste stream generated (rinsate, cloths from wiping, etc.) would need to be designated and managed accordingly. The critical factor is ensuring that there are no environmental releases of a dangerous waste, and all wastes generated are managed appropriately.

Management of Waste Equipment

Contaminated equipment that is intended for discard, or has been abandoned, must be designated and managed in accordance with "WAC 173-303." The regulators are interested in efforts to minimize the generation of waste equipment for which all RCRA requirements may not be met. When it is not possible to avoid generating such equipment, discussions regarding the proper management will be held with Ecology on a case-by-case basis. For example, waste equipment that cannot be placed in a permitted or interim status unit, or disposed of as required in "WAC 173-303-200", would need to be discussed with Ecology.

Installed/Inaccessible Equipment

This category of equipment will be left in place until facility decommissioning and closure. This includes equipment that is isolated in canyon facilities and buried waste transfer piping. The regulators' concerns include how the equipment is managed until that time. The policy commits us to manage this category of equipment in a configuration and condition that does not pose a threat to workers or the environment. This allows the contractors to make appropriate, risk-based decisions regarding the interim management of this equipment.

Definition and Storage of Reusable Equipment

As expected, this category caused the most concern for the regulators. The policy provides for generalized criteria to make a determination of reusability for a piece of equipment. However, this is where we can most expect to be required to defend decisions regarding equipment management. The most important parts of this section are 1) that the justification for reusability must be available at any given time, and 2) such determination shall be re-evaluated periodically. It is important to clarify that this does not imply any formal recordkeeping system or written justification. However, it does require that there be a justifiable reason for calling equipment reusable.

Storage of reusable equipment must be protective of human health and the environment. This does not require that the equipment be removed from the process-related area until the job or project is finished. However, reusable equipment should not be "lying around" unprotected until the next use. The regulators were optimistic when they saw conex boxes placed at various tank farms for storage of reusable equipment. When possible, labeling equipment as reusable and having a designated, protective storage area for this equipment not only complies with the goals of this policy, but also demonstrates the Hanford Sites commitment to responsible equipment management.

This policy allows for a responsible, risk-based approach to contaminated equipment management. The requirements of this policy will be incorporated into WHC-CM-7-5, Environmental Compliance. Environmental Services is available to provide assistance in implementation of the policy, or to conduct a "mock" inspection at your facility to prepare for a regulator visit.

Should you have any questions regarding the Contaminated Equipment Policy or this memorandum, please feel free to contact me at 376-3132, or Ms. L. M. Dittmer, of my staff, on 376-3860.

Eric M. Greager

Eric M. Greager, Manager
RCRA Field Services

lad

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To Lorna/Eric	From Felix
Co. W/HC	Co. DOE
Dept.	Phone #
Fax #	Fax #

STATE OF WASH

DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

October 12, 1995

Mr. James Rasmussen, Director
Environmental Assurance, Permits and Policy Division
U. S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, WA 99352

Dear Mr. Rasmussen:

Re: Management of Contaminated Equipment at the Hanford Site

The Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) have received and reviewed the Management Strategy for contaminated equipment conveyed to our offices via the U.S. Department of Energy (USDOE) document 95-PCA-337. Ecology's policy letter of August 31, 1994, cannot be superseded by USDOE's policy. The agreement not to approve, but rather monitor the implementation of this policy was made in an effort to provide flexibility in the management of contaminated equipment in a manner consistent with the regulations and that protects human health and the environment.

One point of contention remaining involves the decontamination of waste equipment when done for ALARA concerns. Although the regulators are not concerned with dry, physical methods of removing contamination, other techniques such as chemical extraction, ice blasting, and steam cleaning would be considered regulated activities. Options for decontamination of contaminated waste equipment include, but are not limited to: decontamination in a compliant final status treatment unit; decontamination in a compliant generator accumulation area (e.g., treatment by generator); decontamination within the unit (e.g., tank) in which the equipment was used; decontamination associated with closure of a TSD unit provided such decontamination is conducted in a manner consistent with closure requirements; decontamination in accordance with an Agency approved RCRA or CERCLA decision document; or other decontamination approved by the Regulatory Agencies as appropriate to the equipment in question and protective of human health and the environment. It is the responsibility of the regulated community to decide if a regulated activity is taking place, and to ensure the activities and notifications are consistent with the regulations.

A second point that needs clarification involves the management of installed and/or inaccessible equipment. In general, a material which is stored or accumulated, in lieu of being disposed of

becomes a solid waste (WAC 173-303-016(4)), and if that waste designates, the Dangerous Waste Regulations become effective immediately. Ecology understands there are situations where removal of installed and/or inaccessible equipment at this time would pose a threat to human health and the environment, and the environmental value of immediate removal is low. Therefore, Ecology can exercise enforcement discretion to allow installed and inaccessible equipment to be stored until facility closure providing the equipment is managed in a way that is protective of human health and the environment, and the Ecology or EPA Unit Manager is in agreement.

The policy was written as an overall site policy; therefore, the details of different management practices have been omitted. These details will be communicated within each facility through individual Work Plans. As part of the regulatory oversight process, the regulators will review selected work plans, conduct field inspections and notify USDOE and its contractors of any deficiencies or resulting enforcement actions.

EPA and Ecology have formed a Contaminated Media Team to assist USDOE in addressing special cases. If you have any questions or comments regarding contaminated equipment, please contact me at (509) 736-3038.

Sincerely,

Laura J. Cusack, P.E.
Contaminated Media Team Leader

LJC:mf

cc: Felix Miera, USDOE
Dave Bartus, EPA
Eric Greager, WHC

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

DEC 13 1995

96-TEP-040

Mr. Mike Wilson, Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Mr. Wilson:

MANAGEMENT OF CONTAMINATED EQUIPMENT AT THE HANFORD SITE

Staff from the State of Washington Department of Ecology (Ecology), the U.S. Department of Energy, Richland Operations Office (RL), and RL contractors have been working together over the past several years to develop a contaminated equipment policy for the Hanford Site. The U.S. Environmental Protection Agency (EPA) has also participated in this effort as part of the Ecology Team. The details of this policy were transmitted to you in a letter dated June 9, 1995, and represented what we believed to be a consensus agreement between our agencies on the proper management of contaminated equipment at the Hanford Site.

We recently received a letter from Ms. Laura J. Cusack of Ecology on the same subject, dated October 12, 1995. A copy of this letter is enclosed for your convenience. There are three items in Ms. Cusack's letter that we would like to respond to and clarify. First, Ms. Cusack states in her letter that "Ecology's policy letter of August 31, 1994, cannot be superseded by USDOE's policy." The August 31, 1994, letter referred to by Ms. Cusack was entitled "Proposed Site Policy for Contaminated Equipment," and RL considered the policy articulated in that letter to be a proposed policy. At the conclusion of this August 31, 1994, letter, your agency suggested that meetings be held between our agencies to discuss and resolve contaminated equipment issues in an effort to develop practical management standards and implementation strategies for the Hanford Site. This is the approach taken by representatives from your agency, RL, and RL contractors, with the culmination of that effort being the agreed upon contaminated equipment policy described in my June 9, 1995, letter.

It was agreed that Ecology would monitor implementation of the policy for an appropriate amount of time and then jointly modify (as necessary) the policy. RL and its contractors have been implementing the contaminated equipment policy, as agreed, since we transmitted the policy to your agency on June 9, 1995.

Secondly, Ms. Cusack identified a point of contention regarding decontamination of waste equipment that is performed to alleviate As Low As Reasonably Achievable (ALARA) concerns. RL still believes that certain decontamination activities designed to reduce exposure to radionuclides are not Resource Conservation Recovery Act (RCRA) treatment. This is based on the EPA memo issued in November 1984, (the RCRA Permit Policy Compendium number 9432.1984 [05]) in which the EPA stated that, "The definition (of treatment) is made up of two parts: the change in the waste's character affected by treatment and the purpose of the change." We strongly believe that ALARA decontamination does not meet both parts of the treatment definition when waste equipment designated as mixed waste will still be managed as mixed waste following the ALARA decontamination process. Such waste equipment is subject to all applicable treatment standards identified at the point of generation. Nonetheless, we will abide by the options for decontamination of waste equipment, as identified in Ms. Cusack's letter, with one notable addition that was not included in the October 12, 1995, letter. That additional option is to allow decontamination in a compliant "interim status" treatment unit (rather than limiting this to a unit with final status).

Finally, there was an assertion in the October 12, 1995, letter that the Dangerous Waste Regulations are currently applicable to installed and/or inaccessible equipment that might designate as dangerous waste. The letter indicated that Ecology would exercise enforcement discretion to allow storage of installed/inaccessible equipment until facility closure. We believe that EPA guidance supports a determination that contaminated equipment that is an integral part of a facility or unit is not a solid waste. In accordance with EPA guidance, an intact facility should not be considered to be "discarded" until it is actually destroyed (June 3, 1994, memo from Michael Shapiro, Director of EPA's Office of Solid Waste). Similarly, the preamble to the hazardous debris final rule states that materials that might at some later time become debris, such as equipment or building structures, but that are still in use are not subject to the debris treatment standards. Such in-use material is not a solid waste because it has not been discarded or intended for discard (57 FR 37194). During removal of installed and/or inaccessible equipment, it may be advantageous to make use of generator requirements, including the treatment-by-generator provisions, found in the Dangerous Waste Regulations.

Further, the Ecology position taken in the October 12 letter, appears to be inconsistent with the approach taken in Section 14.0 of Amendment 5 to the Hanford Federal Facility Agreement and Consent Order (June 1995). This Section specifically addresses the transition of key facilities to a safe and stable condition and requires development of End Point Criteria to identify

the regulated units and hazardous substances remaining in the facility at the start of the Surveillance and Maintenance Phase. The Disposition Phase will complete the Resource Conservation and Recovery Act closure process and may generate additional waste upon removal of the hazardous substances or equipment, depending on the End State Criteria to be developed during that phase.

Details regarding the management strategy for the disposition of installed and/or inaccessible contaminated equipment will be communicated to Ecology through individual facility work plans.

RL appreciates the good working relationships we have had with your agency and the EPA while developing the contaminated equipment policy. We look forward to continuing these good working relations as Ecology monitors the implementation of the policy.

Should you have any questions on this matter, please contact Mr. F. R. Miera of my staff on 373-7589.

Sincerely,

James E. Rasmussen

James E. Rasmussen, Director
Environmental Assurance, Permits
and Policy Division

Enclosure

cc: J. Badden, BHI
T. Logan, BHI
J. Wilkinson, CTUIR
L. Cusack, Ecology
D. Bartus, EPA
D. Powaukee, NPT
E. Flores, PNL
T. Lazarski, PNL
W. Dixon, WHC
E. Greager, WHC
R. Jim, YIN

CLOSE OUT FORM

ENVIRONMENTAL COMPLIANCE ISSUES
IDENTIFIED IN DOE/RL LETTER 95-PCA-342
DATED JULY 6, 1995

Tracking Number: 14 Date: April 22, 1996

Compliance Issue Description: Contaminated Equipment. Equipment that has contacted dangerous waste is stored at the Hanford Site. Waste equipment that has contacted listed waste or exhibits a characteristic must be managed in accordance with WAC 173-303 (August 13, 1994, letter to Jim Rasmussen (RL), from Michael Gearheard (EPA) and Dru Butler (Ecology) (Attachment 1).
WAC 173-303-016; WAC 173-303-400; WAC 173-303-630; WAC 173-303-800

Basis for Close Out: A contaminated equipment task team was formed which was comprised of Department of Energy, Ecology, EPA and Hanford Site contractors The goal of the task team was to develop a Hanford Site contaminated equipment policy that would be acceptable to the regulators, RL, and the contractors. Ecology was identified as the Lead Regulatory Agency and point of contact for resolution of this issue. Numerous meetings were held with Ecology (and initially EPA) during development of the contaminated equipment policy to receive feedback and assure that the final policy would be mutually acceptable.

The Hanford Site contaminated equipment policy was formally submitted to the regulators in a letter dated June 9, 1995 (Attachment 2). Additional clarification of three issues was provided in a December 13, 1995, letter to Ecology (Attachment 3). The contaminated equipment policy provides for different management strategies depending upon whether the equipment is considered waste, installed and/or inaccessible, or reusable. Waste equipment must be managed in compliance with WAC 173-303. In those cases where strict compliance is impossible or unreasonable, management details must be described in facility-specific action plans that are provided to Ecology for review and concurrence.

Resolution: This policy was jointly developed between RL and Ecology. RL began implementation of the policy in June 1995, and policy was revised in December, 1995. Ecology agreed to monitor implementation of the contaminated equipment policy. The regulators, RL, and the Hanford contractors will periodically evaluate the implementation of the policy and by joint concurrence make changes that will make the contaminated equipment policy more effective.

Installed and/or inaccessible equipment is currently stored within buildings or structures that provide adequate protection of human health and the environment. This category of equipment will be left in place until closure of the facility or operable unit, at which time

proper dispositioning of the contaminated equipment will be determined. The approach for this category of contaminated equipment is consistent with Section 14.0 of Amendment 5 of the TPA, which specifically addresses the transition of key facilities to a safe and stable condition. For those cases where contaminated equipment is not addressed by Section 14.0, action plans will be provided to Ecology as described above. Reusable equipment will be managed in such a manner to prevent releases of dangerous waste and be protective of human health and the environment.

This policy is protective of human health and the environment, requiring that all equipment be managed in a manner that minimizes the potential for a release of hazardous waste to the environment. Alternative decontamination methods for reusable equipment, when needed, minimize the generation of additional dangerous waste while ensuring safe storage of the equipment between uses. Separate action plans specific to programatic needs, e.g., Tank Waste Remediation Program, will be developed based upon guidelines provided within the Hanford Site contaminated equipment policy.

This represents the agreement by the specified Agencies to the resolution described above for this compliance issue. The persons signing below represent that they are authorized to agree on behalf of their respective Agencies to this resolution.

Ecology _____ Date 7/3/96

DOE Program _____ Date _____

DOE EAP _____ Date 7/3/96

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ADMINISTRATIVE RECORD [B Plant TS-2-3]: EDMC H6-08

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Please send comments on distribution list to Steve Godfrey, BWHC (S4-49), (509) 372-0501, or Tom Beam, BWHC (S4-66), (509) 372-0019.